



RECEIVED

11 DEC -5 AM 2:58

SUPERFUND DIV.  
DIRECTOR'S OFFICE

TEL 713.627.7474  
FAX 713.626.3850

5151 San Felipe, Suite 800, Houston, Texas 77056  
www.tpcgrp.com

Marise Lada Textor, P.E.  
Corporate Director, Regulatory Affairs

December 1, 2011

Ms. Cynthia Brown  
Removal Enforcement Coordinator (6SF-TE)  
United States Environmental Protection Agency (EPA)  
Region 6  
1445 Ross Avenue  
Dallas, TX 75202

**VIA Certified Mail Return Receipt Requested No. 7007 3020 0000 6243 5922**

**RE: Response from TPC Group (Formerly Texas Petrochemicals Corporation) for General Notice Letter and CERCLA 104(e) Information Request, U.S. Oil Recovery, L.P., Pasadena, Harris County, TX, SSID No. A6X7**

Dear Ms. Brown,

This letter is in response to EPA's letter of October 26, 2011, received by TPC Group on November 2, 2011, requesting information from Texas Petrochemicals Corporation regarding its use of U.S. Oil Recovery, L.P. (USOR), located in Pasadena, Harris County, Texas. In 2010, Texas Petrochemicals changed its name to TPC Group, and is hereinafter referred to as "TPC".

TPC's use of the USOR site was de minimus, involving eight tanker truck shipments of oily water shipped entirely over a four-day period in October 2007, from October 9 through October 12, 2007. A diligent search of TPC's Gulf Coast facilities indicates that our activity with USOR was limited to these eight manifests. As EPA knows from its volumetric survey, this accounts for approximately 0.2% of the wastes thus far found to be received by the site. As more information on operations comes to light, and new PRPs are identified from USOR business records and other sources such as records from other states in addition to Texas, we are confident that our share of the total waste volume will shrink. Also, the likelihood that any of TPC Group's 2007 waste remained in tanks or impoundments when USOR halted processing in 2010 is, we believe, extremely remote.

In accordance with EPA's instructions in its October 26 letter, we are responding to the questions in EPA's Enclosure D, 104(e) Information Request as provided in Attachment I.

While TPC believes that its response to the 104(e) request is complete, TPC formally requests an extension of 45 days to continue our records search, and to respond to EPA's request to sign the August 25, 2011, Administrative Order on Consent (AOC). Our reasons for seeking this modest extension for the AOC include the following:

- TPC has met EPA's objective to promptly gather relevant records and information and respond to the General Notice Letter on gathering information to respond to EPA's 104(e) Information Request.

**Quality Products. Dependable Services.**



650174

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

- Beyond the CERCLA 104(e) Information Request, EPA's General Notice Letter contains significant information which we have been asked to digest over a short period of time.
- TPC learned significant new information about the USOR site during the PRP meeting on November 30, just a few days, less than a week, before the original due date.
- The USOR case is TPC's first experience with potential liability in a Superfund case, and the company and its managers desire an opportunity to become familiar with the statute and issues surrounding this event. In addition, as you will see throughout our responses, a number of key personnel involved are no longer with TPC and we would like additional time to follow up with these individuals and better understand their involvement.
- Timing of the AOC request and our evaluation comes during Thanksgiving, Christmas, and New Year holiday periods; further, concurrent vacations of key personnel whose involvement is needed for decision making necessarily slows our response.

For these reasons, TPC submits that 30 days is insufficient time to fully understand the AOC and its attachments and other information about the USOR site. We respectfully request an extension of 45 days from receipt of EPA's letter which will put the due date of our decision and response regarding the AOC on January 14, 2012. Considering that January 14 falls on a weekend, we will submit our decision no later than Monday, January 16, 2012.

At this juncture, TPC has found no records indicating any use of the Site prior to May 2004, nor do we believe that any such records exist. Should, however, such records surface at a later date, TPC notes that any liability associated with the site prior to May 2004 would have been discharged as part of TPC's reorganization under Chapter 11 of the U.S. Bankruptcy Code in May 2004. Consequently, any claims against TPC relating to the USOR site prior to May 2004 would be barred.

If you have any questions on this information, please do not hesitate to contact me at 713-840-2410 or [marise.textor@tpcgrp.com](mailto:marise.textor@tpcgrp.com).

Sincerely,



Marise Lada Textor  
Corporate Director – Regulatory Affairs

Attachments:

- Attachment I. Response to 104(e) Information Request
- Attachment II. TPC Corporate Organizational Chart
- Attachment III. Waste Profile

cc:

Michael Smith, Fowler Rodriguez Valdes-Fauli, LLP  
Rishi Varma, Vice President and General Counsel - TPC Group

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

## Attachment I

# Response to 104(e) Information Request

---

For ease of reading, EPA questions are shown in **bold**, and TPC Group response shown in non-bolded *italics*.

**1. Please provide the full legal name, mailing address and phone number of the Respondent.**

*TPC Group Inc.  
5151 San Felipe Suite 800  
Houston, TX 77056*

*713-627-7474*

*Note: TPC Group Inc. was formerly known as Texas Petrochemicals Inc.*

**2. For each person answering these questions on behalf of the Respondent please provide full name, title, business address and business telephone and facsimile number.**

*Marise Lada Textor  
Corporate Director, Regulatory Affairs  
TPC Group Inc.  
5151 San Felipe Suite 800  
Houston, TX 77056*

*Telephone 713-840-2410  
Facsimile 281-271-4506*

**3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number and facsimile number.**

*Marise Lada Textor  
Corporate Director, Regulatory Affairs  
TPC Group Inc.  
5151 San Felipe Suite 800  
Houston, TX 77056*

*Telephone 713-840-2410  
Facsimile 281-271-4506*

**4. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:**

- a. Whether the company or business continues to exist, indicating the date and means by which it ceased operations, if it is no longer in business;**

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

**b. Names, addresses and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates and parent corporations if any, of the respondent.**

*The full corporate history of TPC Group Inc. (the "Company"), a Delaware corporation formerly known as Texas Petrochemicals Inc., beginning at the original date of incorporation, including all corporate changes that have occurred until present day, is as follows:*

- 1. The Company was incorporated under the laws of the State of Delaware on March 15, 2004.*
- 2. On May 3, 2004, the Company amended and restated its Certificate of Incorporation and filed an Amended and Restated Certificate of Incorporation with the Delaware Secretary of State.*
- 3. On January 22, 2010, the Company's wholly-owned subsidiary, Texas Petrochemicals 2010 Newco Inc., merged with and into the Company, and the Company changed its name to TPC Group Inc., as reflected in the Certificate of Ownership and Merger filed by the Company with the Delaware Secretary of State on January 22, 2010.*

*Also included in our response as Attachment II is an organizational chart providing names of all subsidiaries, unincorporated divisions or operating units, affiliates, etc. The address and telephone number for all entities are the same as that for the parent corporation:*

*5151 San Felipe Suite 800  
Houston, TX 77056*

*713-627-7474*

*The following is an excerpt from the Company's 10-K report, providing additional background information.*

*"In January 2010, Texas Petrochemicals Inc., a Delaware corporation formed in March 2004, changed its name to TPC Group Inc. At the same time, its wholly owned operating subsidiary, Texas Petrochemicals LLC, a Texas limited liability company, changed its name to TPC Group LLC.*

*Our business is a successor to Texas Olefins Company, a company that was founded in 1968 and initially engaged in hydrocarbon trading activities. In 1984, Texas Olefins Company acquired various assets from Tenneco, Inc., including our Houston facility. Texas Olefins Company subsequently operated as Texas Petrochemicals Corporation. In 1996, during a period of strong profitability in the MTBE market, the business was purchased by management and other investors in a leveraged buyout.*

*The MTBE market was severely impacted in the early 2000s by regulatory changes in various states, including changes that banned the use of MTBE as a gasoline blending stock. These factors led to the conclusion that future cash flows of the business would be insufficient to meet its subordinated bond interest payments over the long-term, and that a permanent financial restructuring would be required. As a result, on July 21, 2003, the operating subsidiary filed a voluntary petition for relief under Chapter 11 of the U.S. Bankruptcy Code. Pursuant to a court-approved plan of reorganization, the operating subsidiary was acquired by Texas Petrochemicals Inc. (now known as TPC Group Inc.), a holding company owned by a new group of stockholders, including previous bondholders and unsecured creditors. As a result of the plan of reorganization, the operating subsidiary emerged from its Chapter 11 proceedings on May 6, 2004."*

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

- 5. Provide information describing the nature of the business that this entity and its predecessors had with U.S. Oil Recovery at the 400 North Richey Street and the 200 North Richey Street, Pasadena, Texas, locations known here as the Site.**

*During a four-day period in October 2007, from October 9 through October 12, 2007, TPC's Houston plant shipped eight truckloads of oily water to the Site. TPC arranged for these shipments by means of subcontracting through its primary contractor, Goodgames Industrial Solutions. A file search of TPC's manifests on file indicates no other use of or business with the Site.*

- 6. Identify all persons, including yourself, on behalf of your company, who may have transported or arranged for transportation of materials to the Site.**

*TPC arranged for these shipments by means of subcontracting to its primary contractor, Goodgames Industrial Solutions. Our records indicate that Van Goodgame of Goodgames Industrial Solutions arranged for the transportation to the Site through Bealine Service Co., Inc. of Pasadena, TX.*

- 7. Provide the name, telephone numbers and present or last known addresses of all individuals who you have reason to believe may have knowledge, information or documents regarding any generation and/or transportation of hazardous substances to the Site.**

Primary Contractor:

Van Goodgame  
Goodgames Industrial Solutions  
Mailing Address P.O. Drawer L or Street Address 321 FM 517 Rd. East  
Dickinson, TX 77539  
Telephone (281) 337-7323

Employee:

Marise Textor  
TPC Group  
5151 San Felipe Suite 800  
Houston, TX 77056  
Telephone 713-840-2410

Employee:

Frank Guerrero  
TPC Group Houston Plant  
8600 Park Place  
Houston, TX 77017  
Telephone 713-740-3014

Former Employee:

Tariq Ali  
Energy Leader, KSA, MCE  
Saudi Basic Industries Corporation  
Jubail Industrial City 31961  
Saudi Arabia  
Telephone +966 (3) 357 1100-2618

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

Former Employee:

Bernadette Chaisson  
1083-B Brentwood Way  
Atlanta, Georgia 30350  
Telephone (832) 748-8068

Former Employee:

Gregg Prill  
16311 Wrangler Road  
Rosharon, TX 77583  
Telephone (281)369-3230

Former Employee:

Kelly Tinsley  
3715 Clover Creek Drive  
Kingwood, TX 77345  
Telephone (281)360-7356

8. Identify all persons and entities (generators) from whom you accepted materials which were taken directly or indirectly to the U.S. Oil Recovery Site.

*TPC did not accept materials from any other generator to take to the Site.*

9. Describe the nature, including the chemical content, characterization, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each arrangement for disposal or treatment sent to the Site, as a generator or transporter.

- a. Include the information about the process of generation of the wastes, including analytical data, waste profiles, etc. that you sent or transported, or arranged to be sent or transported, to the Site.

*The material that TPC sent to the Site consisted entirely of oily water, characteristically hazardous for benzene. The material was generated at TPC's Houston plant, a chemical plant that manufactures chemical intermediate products for use by industrial customers. The chemical intermediate products from the plant include 1,3-butadiene, isobutylenes, diisobutylene, polyisobutylenes, butenes, and raffinates. TPC's investigation into its use of the Site revealed that the material originated from the following sources at TPC's Houston plant:*

- Oil water separation equipment within the manufacturing process*
- The API separator downstream of the manufacturing process and upstream of wastewater treatment*
- The wastewater treatment system*

*TPC's wastewater treatment system discharges effluent under TPDES (Texas Pollutant Discharge Elimination System) permit number WQ0000587000.*

- b. Provide information and documentation related to sampling results used to determine the nature of the material you sent to USOR which identified any hazardous substances in such material.

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

*Please refer to Attachment III, the waste profile for US Oil Recovery dated October 4, 2007. The profile provides an analytical summary of the waste and describes it as water from the API separator, containing 1 to 5 percent C6 to C12 organics, 2.2 ppm benzene, and no PCBs, cyanides, sulfides, or phenolics, and having a pH in the range of 4 to 8.*

*In addition, documentation attached to TPC's purchase order for the waste shipments includes the following analytical summary:*

Phases/Layers	1
Odor	-
Flash Point	>212.0 deg. F
Density	8.34
Color	Black
pH	6.0-11.0
Total Cyanide	n/d
Total Sulfide	n/d
Chemical Oxygen Demand	<4000 ppm
Total Suspended Solids	<600 ppm
Oil and Grease	<1%

10. List the name of all persons, including yourself, on behalf of your company, who may have entered into an agreement or contract for the disposal, treatment or transportation of a hazardous substance at or to the U.S. Oil Recovery Site. Please provide the persons' titles and departments.

*TPC contracted through its primary consultant and contractor, Goodgames Industrial Solutions, for offsite disposal services including TPC's shipments to the Site. Goodgames then acted as an independent broker in arranging for transportation and disposal of the aqueous waste. Goodgames chose US Oil Recovery as the disposal Site for these particular shipments. TPC communicated with Van Goodgame, who is listed on Goodgames website (<http://gis-llc.com/index.html>) as the President and CEO. TPC's former employee Annie Gonzalez was the individual who procured services from Goodgames for the purchase order with them.*

11. Who selected the location where the hazardous substances were to be disposed or treated?

*Goodgames Industrial Solutions selected the Site for management of the wastes shipped there. Their choice of disposal sites was apparently disclosed to and acknowledged by TPC.*

12. How were the hazardous substances or materials containing hazardous substances planned to be used at the Site?

*TPC has not been able to locate documentation confirming how USOR would manage the wastes from TPC. Based on the type of waste shipped, oily water, and the processing operations at the Site, we surmise that USOR intended to separate oil and solids, recover the oil for use in some manner, stabilize and dispose of solids offsite, and treat water prior to discharge through its wastewater discharge permit.*

13. What was done to the hazardous substances once they were brought to the Site, including any service, repair, recycling, treatment, or disposal.

*TPC does not have records with this information. Please refer to the response to Question 12.*

Response from TPC Group (Formerly Texas Petrochemicals Corporation) for General Notice Letter and CERCLA 104(e) Information Request, U.S. Oil Recovery, L.P., Pasadena, Harris County, TX, SSID No. A6X7

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

**14. What activities were typically conducted at the Site where the hazardous substances were sent? What were the common business practices at the Site? How and when did you obtain this information?**

*TPC did not regularly conduct business with USOR; no audits or site visits were conducted of USOR by our company that would help us address this question. Upon receiving EPA's General Notice Letter, TPC obtained information regarding activities at the Site from EPA's Hazard Ranking System Documentation Record dated September 2011, which describes site operations to include oil and solids removal from wastewater and wastewater treatment.*



Response from TPC Group (Formerly Texas Petrochemicals Corporation) for General Notice Letter and CERCLA 104(e) Information Request, U.S. Oil Recovery, L.P., Pasadena, Harris County, TX, SSID No. A6X7

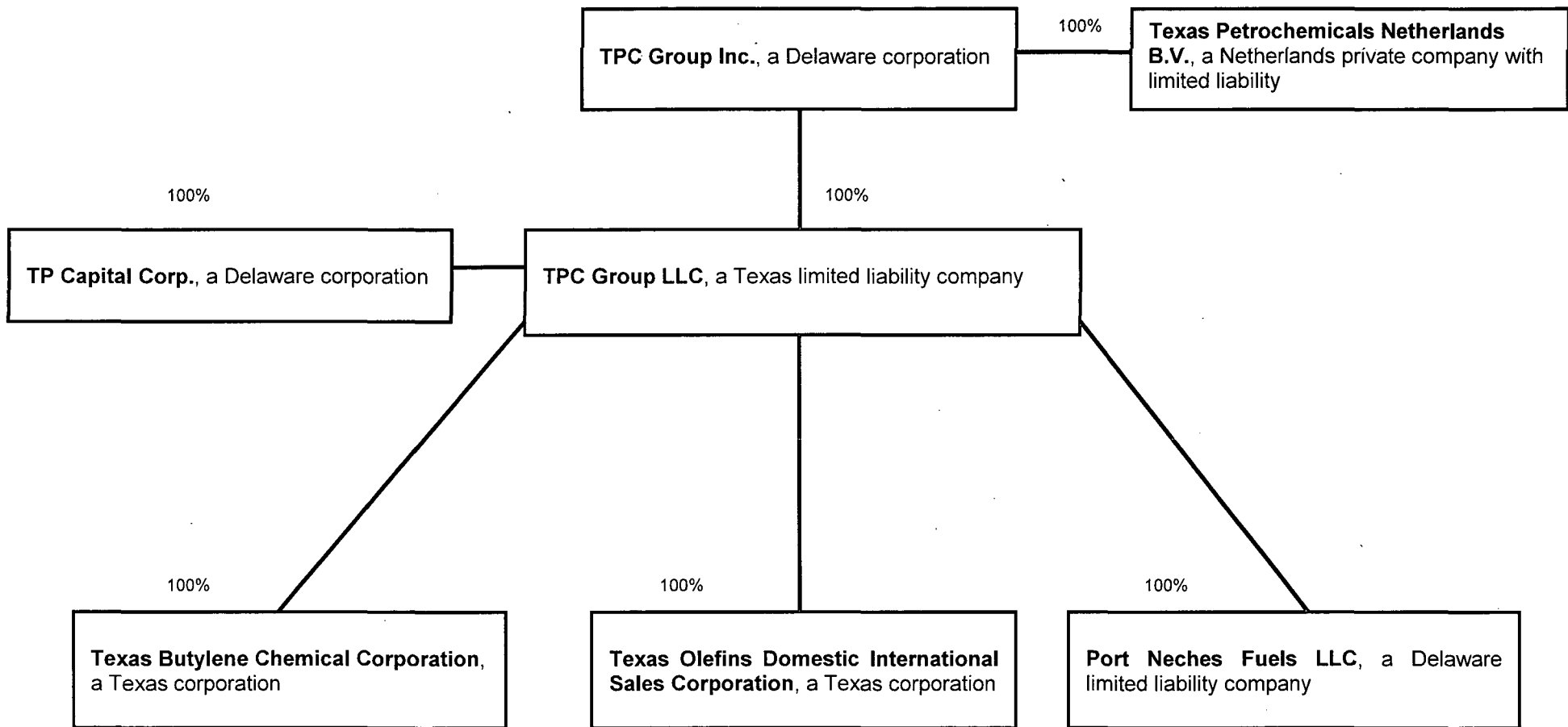
Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

## **Attachment II**

# **TPC Corporate Organizational Chart**

---



Response from TPC Group (Formerly Texas Petrochemicals Corporation) for General Notice Letter and CERCLA 104(e) Information Request, U.S. Oil Recovery, L.P., Pasadena, Harris County, TX, SSID No. A6X7

Letter to Ms. Cynthia Brown, Removal Enforcement Coordinator (6SF-TE), United States Environmental Protection Agency (EPA), Region 6, 1445 Ross Avenue, Dallas, TX 75202

December 1, 2011

## **Attachment III**

## **Waste Profile**

---

**BUSINESS  
CONFIDENTIAL**

**US OIL RECOVERY LP**  
Generator Liquid Profile Sheet  
Please Print in Ink or Type

0064  
0710-21231

This Area for USOR Use Only

Profile Number \_\_\_\_\_

Sales Rep: \_\_\_\_\_

Location: 400 N. Richey, Pasadena

Renewal Date \_\_\_\_/\_\_\_\_/\_\_\_\_

**A. Where Is the Waste Generated?**

1. Generator Name: Texas Petrochemicals LP	
2. Facility Address: 8600 Park Place Blvd	
3. Generator City: Houston State: TX 4. Zip Code: 77017	
5. U.S. EPA ID # TXD008072134	
6. Generator State ID #: 38417 7. TCEQ Waste Code: 0064102H	
<input type="checkbox"/> Class I <input type="checkbox"/> Class II <input type="checkbox"/> Recyclable <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Haz <input type="checkbox"/> Other	
8. Technical Contact: Tariq Ali 9. Phone: (281) 682-6497	
10. Customer Contact: Van Goodgame 11. Phone: 281-337-7323	
12. Company Name: Goodgames Industrial Solutions	

**B. Physical Characteristics of the Waste**

1. Name or Type of Waste: Organic contaminated water	
2. Process Generating Waste: Describe the process and material involved in generating the waste. Attach separate sheets if necessary: Water from API separator	
3. Special Handling Instructions:	
4. Color: black 5. Odor <input checked="" type="checkbox"/> yes <input type="checkbox"/> no Describe: mild organic	
6. Physical State at 70°F: <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Other Describe:	
7. Layers: <input checked="" type="checkbox"/> Single Phase <input type="checkbox"/> Bi-Layered <input type="checkbox"/> Multi-Layered	
8. Specific Gravity (Water = 1.00): 1.0 Range: 1.0 - 1.0	
9. pH: <input type="checkbox"/> ≤2 <input type="checkbox"/> 2-4 <input checked="" type="checkbox"/> 4-6 <input checked="" type="checkbox"/> 6-8 <input type="checkbox"/> 8-10 <input type="checkbox"/> 10-12 <input type="checkbox"/> 12-14	
10. Flash Point: <input type="checkbox"/> None <input type="checkbox"/> < 140°F <input type="checkbox"/> 140°F - 199°F <input checked="" type="checkbox"/> > 200°F	
11. Frequency: <input type="checkbox"/> One Time <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Annually <input type="checkbox"/> Other: Amount: 10,000 gal	

**C. Transporter Information**

Method of Shipment <input checked="" type="checkbox"/> Bulk Liquid <input type="checkbox"/> Bulk Sludge <input type="checkbox"/> Drum <input type="checkbox"/> Roll Off <input type="checkbox"/> Other	
Transporter Name: Bealine	
TCEQ Registration #: _____ EPA ID: _____	

**D. Waste Composition**

Example (Water, Solids, Oil Etc.) % Range	Min %	Max %	Does the waste contain the following?
C-6 - C-12 Organics	1	5	No or Less Than Actual
Water	95	100	PCB's <input checked="" type="checkbox"/> <input type="checkbox"/> <50 ppm ppm
Benzene	2.2ppm		Cyanides <input checked="" type="checkbox"/> <input type="checkbox"/> <50 ppm ppm
			Sulfides <input checked="" type="checkbox"/> <input type="checkbox"/> <50 ppm ppm
			Phenolics <input checked="" type="checkbox"/> <input type="checkbox"/> <50 ppm ppm
Please Note: Total must equal 100%	Total		

Additional information (MSDS, TCLP, Etc.)? ☐ NO ☒ YES Describe: TCLP

**US OIL RECOVERY LP**  
**Generator Liquid Profile Sheet**  
**Please Print in Ink or Type**

**E. Generator Certification**

By signing this profile sheet, the generator (or his representative) certifies that unless clearly stated above or in attachments:

1. This waste does not contain regulated quantities of PCB's (polychlorinated biphenyls).
2. This waste ☒ is ☐ is not hazardous by reference to local and state law or by reference to US EPA rules 40 CFR Part 261 Subpart C (characteristic hazardous wastes) and Part 261 Subpart D (listed hazardous wastes). If characteristic hazardous list codes: D018
3. This sheet and its attachments obtain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the generator have been disclosed.
4. The generator will promptly notify USOR of any material change in the composition of the waste which could result in the waste otherwise being characterized as hazardous pursuant to US EPA rules.

Generator Authorized Signature: <u>Bernadette M. Chilson</u>	Printed Name: <u>Bernadette M. Chilson</u>
Title: <u>SR Env Sci</u>	Date: <u>10/4/07</u>

**F. Submittals**

1. Representative one quart sample of waste material.
2. Copy of form and supplemental information submitted to the Texas Commission on Environmental Quality for waste classification purposes.
3. Copies of applicable Material Safety Data Sheets.
4. Signed laboratory analysis of waste

**Generator's Certification of Representative Sample (Fill Out Only if Submitting a Sample)**

In order to determine whether USOR can accept the Liquid Waste described in the Generator's Liquid Waste Profile Sheet Code referenced above, you must supply a representative sample of the waste, or sign Part E below certifying that analytical data presented to USOR were derived from testing of a representative sample. A representative sample is defined as a sample obtained using any of the applicable sampling methods specified in federal, state or local regulations. If you collect a representative sample of your waste, label and ship your sample along with this form to USOR. If you have any questions, please refer to the instructions for this form or contact USOR

**A. Sampling Method (Indicate the method used)**

- 1. ☒ I have obtained a representative sample of the waste material described in the Generator's Liquid Waste Profile Sheet referenced above according to the sampling methods specified in 40 CFR 261 - Appendix 1.
- 2. ☐ I have obtained a representative sample of the waste material described in the Generator's Liquid Waste Profile Sheet referenced above by an equivalent method.

**B. Sampling Source:**

☐ Drum ☐ Lagoon ☐ Pit ☐ Pond ☐ Tank ☒ Vat ☐ Other (Describe) \_\_\_\_\_

**Witness Verification (if required):** In most circumstances the customer will obtain the sample. However, in those cases in which USOR or another contractor obtains the sample, one of the customer's employees must be present to direct the particular source to be sampled, to witness the sampling and to complete this part D.

**D. I was personally present during the sampling described. I directed the waste source to be sampled, and I verify the information noted above.**

Witness' Name (printed):	Signature:
Witness' Title:	Employer: Date:

**E. Representative Data Certification**

By signing below the customer is certifying that the analytical data presented to USOR were derived from testing of a representative sample taken in accordance with one of the methods listed in Part A of this form.

Printed Name:	Signature:
Title:	Date:

November 2011

## GOODYEAR BUTADIENE

TPC MASS FLOW METER 17FQI-5522

GOODYEAR:

METER PROVED:

Old Factor 0.99588 08/04/2011

DANIEL TAMEZ 713-475-5325

New Factor 0.98747 11/9/11

+/- .5% DIFFERENCE: TECH SERVICE

FAX 713/475-5436

TPC MICRO MOTION METER				GOODYEAR		TPC M/M METER		DATE	BBLs.	
READING			NET POUNDS	NET POUNDS	MTD POUNDS	VS GOODYEAR				
BEGINNING	ENDING	DIFFERENCE				DAILY DIFFERENCE/PERCENT				
01-Nov	575957888	576413864	455976	454,097	450,957	450,957	3140	0.69%	01-Nov	2068
02-Nov	576413864	576871486	457622	455,737	457,262	908,219	-1525	-0.33%	02-Nov	2075
03-Nov	576871486	577427948	556462	554,169	551,398	1,459,617	2771	0.50%	03-Nov	2523
04-Nov	577427948	577950784	522836	520,682	528,640	1,988,257	-7958	-1.53%	04-Nov	2371
05-Nov	577950784	578541248	590464	588,031	576,585	2,564,842	11446	1.95%	05-Nov	2678
06-Nov	578541248	579199168	657920	655,209	1,264,084	3,828,926	-608875	-92.93%	06-Nov	2983
07-Nov	579199168	579881572	682404	679,592	698,682	4,527,608	-19090	-2.81%	07-Nov	3094
08-Nov	579881572	580650432	768860	765,692	203,784	4,731,392	561908	73.39%	08-Nov	3486
09-Nov	580650432	581429696	779264	769,500	777,863	5,509,255	-8363	-1.09%	09-Nov	3504
10-Nov	581429696	582258752	829056	818,668	820,807	6,330,062	-2139	-0.26%	10-Nov	3728
11-Nov	582258752	582959968	701216	692,430	695,592	7,025,654	-3162	-0.46%	11-Nov	3153
12-Nov	582959968	583624896	664928	656,596	663,176	7,688,830	-6580	-1.00%	12-Nov	2990
13-Nov	583624896	584198976	574080	566,887	562,998	8,251,828	3889	0.69%	13-Nov	2581
14-Nov	584198976	584695168	496192	489,975	504,014	8,755,842	-14039	-2.87%	14-Nov	2231
15-Nov	584695168	585130624	435456	430,000	438,199	9,194,041	-8199	-1.91%	15-Nov	1958
16-Nov	585130624	585534912	404288	399,222	396,406	9,590,447	2816	0.71%	16-Nov	1818
17-Nov	585534912	585810393	275481	272,029	274,957	9,865,404	-2928	-1.08%	17-Nov	1239
18-Nov	585810393	586170944	360551	356,033	361,684	10,227,088	-5651	-1.59%	18-Nov	1621
19-Nov	586170944	586621440	450496	444,851	457,420	10,684,508	-12569	-2.83%	19-Nov	2026
20-Nov	586621440	587137182	515742	509,280	506,697	11,191,205	2583	0.51%	20-Nov	2319
21-Nov	587137182	587652352	515170	508,715	531,476	11,722,681	-22761	-4.47%	21-Nov	2316
22-Nov	587652352	588190144	537792	531,053	515,199	12,237,880	15854	2.99%	22-Nov	2418
23-Nov	588190144	588706560	516416	509,945	507,008	12,744,888	2937	0.58%	23-Nov	2322
24-Nov	588706560	589279104	572544	565,370	575,976	13,320,864	-10606	-1.88%	24-Nov	2574
25-Nov	589279104	589881920	602816	595,263	120,696	13,441,560	474567	79.72%	25-Nov	2710
26-Nov	589881920	590498048	616128	608,408	614,742	14,056,302	-6334	-1.04%	26-Nov	2770
27-Nov	590498048	591083648	585600	578,262	577,741	14,634,043	521	0.09%	27-Nov	2633
28-Nov	591083648	591567872	484224	478,157	477,242	15,111,285	915	0.19%	28-Nov	2177
29-Nov	591567872	591939740	371868	367,208	378,983	15,490,268	-11775	-3.21%	29-Nov	1672
30-Nov	591939740	592432384	492644	486,471		15,490,268	486471	100.00%	30-Nov	2215
01-Dec	592432384		0	0		15,490,268	0	0.00%	01-Dec	0
				16,307,532	15,490,268					

MTD DIFFERENCE

LBS.

74253

TPC MM VS GOODYEAR

817,264

### Baytown Monthly Butadiene Log

Month	November		Year	2011
Date	BD # from P/L	BD # to LCY	Bd # to T/T	Bd # from T/T
11/1/2011	134,121	99,621	0	0
11/2/2011	137,991	225,671	0	0
11/3/2011	167,222	126,245	0	0
11/4/2011	149,946	223,063	0	0
11/5/2011	289,722	288,860	0	0
11/6/2011	206,303	189,863	0	0
11/7/2011	40,061	123,607	0	0
11/8/2011	189,794	219,909	0	0
11/9/2011	0	21,169	0	0
11/10/2011	0	0	0	0
11/11/2011	0	41,801	0	0
11/12/2011	0	11,260	0	0
11/13/2011	0	17,071	0	0
11/14/2011	32,941	26,680	0	0
11/15/2011	33,199	48,268	0	0
11/16/2011	66,103	111,364	0	0
11/17/2011	153,589	160,543	0	0
11/18/2011	151,993	160,302	0	0
11/19/2011	261,327	213,488	0	0
11/20/2011	174,357	220,353	0	0
11/21/2011	124,170	111,157	0	0
11/22/2011	225,043	222,055	0	0
11/23/2011	147,920	221,432	0	0
11/24/2011	288,241	245,114	0	0
11/25/2011	153,983	236,974	0	0
11/26/2011	78,585	50,860	0	0
11/27/2011	116,631	102,162	0	0
11/28/2011	54,105	160,578	0	0
11/29/2011	194,367	219,599	0	0
11/30/2011	184,124	191,901	0	0
12/1/2011	0	0	0	0
Totals	3,755,838	4,290,970	0	0

### Baytown Monthly Butadiene Log

Month	November		Year	2011
Date	BD # from P/L	BD # to LCY	Bd # to T/T	Bd # from T/T
11/1/2011	134,121	99,621	0	0
11/2/2011	137,991	225,671	0	0
11/3/2011	167,222	126,245	0	0
11/4/2011	149,946	223,063	0	0
11/5/2011	289,722	288,860	0	0
11/6/2011	206,303	189,863	0	0
11/7/2011	40,061	123,607	0	0
11/8/2011	189,794	219,909	0	0
11/9/2011	0	21,169	0	0
11/10/2011	0	0	0	0
11/11/2011	0	41,801	0	0
11/12/2011	0	11,260	0	0
11/13/2011	0	17,071	0	0
11/14/2011	32,941	26,680	0	0
11/15/2011	33,199	48,268	0	0
11/16/2011	66,103	111,364	0	0
11/17/2011	153,589	160,543	0	0
11/18/2011	151,993	160,302	0	0
11/19/2011	261,327	213,488	0	0
11/20/2011	174,357	220,353	0	0
11/21/2011	124,170	111,157	0	0
11/22/2011	225,043	222,055	0	0
11/23/2011	147,920	221,432	0	0
11/24/2011	288,241	245,114	0	0
11/25/2011	153,983	236,974	0	0
11/26/2011	78,585	50,860	0	0
11/27/2011	116,631	102,162	0	0
11/28/2011	54,105	160,578	0	0
11/29/2011	194,367	219,599	0	0
11/30/2011	184,124	191,901	0	0
12/1/2011	0	0	0	0
Totals	3,755,838	4,290,970	0	0



### Baytown Monthly Butadiene Log

Month	<i>November</i>		Year	2011
Date	BD # from P/L	BD # to LCY	Bd # to T/T	Bd # from T/T
11/1/2011	134,121	99,621	0	0
11/2/2011	137,991	225,671	0	0
11/3/2011	167,222	126,245	0	0
11/4/2011	149,946	223,063	0	0
11/5/2011	289,722	288,860	0	0
11/6/2011	206,303	189,863	0	0
11/7/2011	40,061	123,607	0	0
11/8/2011	189,794	219,909	0	0
11/9/2011	0	21,169	0	0
11/10/2011	0	0	0	0
11/11/2011	0	41,801	0	0
11/12/2011	0	11,260	0	0
11/13/2011	0	17,071	0	0
11/14/2011	32,941	26,680	0	0
11/15/2011	33,199	48,268	0	0
11/16/2011	66,103	111,364	0	0
11/17/2011	153,589	160,543	0	0
11/18/2011	151,993	160,302	0	0
11/19/2011	261,327	213,488	0	0
11/20/2011	174,357	220,353	0	0
11/21/2011	124,170	111,157	0	0
11/22/2011	225,043	222,055	0	0
11/23/2011	147,920	221,432	0	0
11/24/2011	288,241	245,114	0	0
11/25/2011	153,983	236,974	0	0
11/26/2011	78,585	50,860	0	0
11/27/2011	116,631	102,162	0	0
11/28/2011	54,105	160,578	0	0
11/29/2011	194,367	219,599	0	0
11/30/2011	184,124	191,901	0	0
12/1/2011	0	0	0	0
Totals	3,755,838	4,290,970	0	0

TEXAS PETROCHEMICALS LP

EXXON BUTADIENE  
November 2011EXXON:  
ATTENTION: MELISSA CANTU-BOP 281.834.6221  
FAX: 281.834.6414  
TOM LEAL 281.834.3706

01-Dec-11

TPC METER PROVED: 11/05/10

EXXON METER READINGS - FQY110						TPC METER			TPC M/M METER					
DATE	TICKET NO.	INITIAL READING	FINAL READING	NET M POUNDS	NET POUNDS	DATE	NET POUNDS	MTD POUNDS	VS EXXON DAILY DIFF/PERCENT		DATE	NET POUNDS	MTD POUNDS	BPD
01-Nov		94600.11	94600.11	0.00	4	01-Nov	0	0	0	0.00%	01-Nov	0	0	0
02-Nov		94600.11	94600.11	0.00	0	02-Nov	297,696	297,696	0	0.00%	02-Nov	297,696	297,696	1,356
03-Nov		94600.11	94600.11	0.00	0	03-Nov	82,795	380,490	0	0.00%	03-Nov	82,795	380,490	377
04-Nov		94600.11	94600.11	0.00	0	04-Nov	0	380,490	0	0.00%	04-Nov	0	380,490	0
05-Nov		94600.11	94600.11	0.00	0	05-Nov	380,099	760,589	0	0.00%	05-Nov	380,099	760,589	1,731
06-Nov		94600.11	94600.11	0.00	0	06-Nov	0	760,589	0	0.00%	06-Nov	0	760,589	0
07-Nov		94600.11	94600.11	0.00	0	07-Nov	0	760,589	0	0.00%	07-Nov	0	760,589	0
08-Nov		94600.11	94600.11	0.00	0	08-Nov	0	760,589	0	0.00%	08-Nov	0	760,589	0
09-Nov		94600.11	94600.11	0.00	0	09-Nov	162,732	923,321	0	0.00%	09-Nov	162,732	923,321	741
10-Nov		94600.11	94600.11	0.00	0	10-Nov	217,332	1,140,654	0	0.00%	10-Nov	217,332	1,140,654	990
11-Nov		94600.11	94600.11	0.00	0	11-Nov	824,550	1,965,204	0	0.00%	11-Nov	824,550	1,965,204	3,754
12-Nov		94600.11	94600.11	0.00	0	12-Nov	0	1,965,204	0	0.00%	12-Nov	0	1,965,204	0
13-Nov		94600.11	94600.11	0.00	0	13-Nov	0	1,965,204	0	0.00%	13-Nov	0	1,965,204	0
14-Nov		94600.11	94600.11	0.00	0	14-Nov	845,592	2,810,796	0	0.00%	14-Nov	845,592	2,810,796	3,850
15-Nov		94600.11	97509.40	2909.29	2,909,287	15-Nov	31,362	2,842,157	0	0.00%	15-Nov	31,362	2,842,157	143
16-Nov		97509.40	97509.40	0.00	0	16-Nov	0	2,842,157	0	0.00%	16-Nov	0	2,842,157	0
17-Nov		97509.40	97509.40	0.00	0	17-Nov	788,179	3,630,336	0	0.00%	17-Nov	788,179	3,630,336	3,589
18-Nov		97509.40	97509.40	0.00	0	18-Nov	860,213	4,490,549	0	0.00%	18-Nov	860,213	4,490,549	3,917
19-Nov		97509.40	97509.40	0.00	0	19-Nov	889,579	5,380,128	0	0.00%	19-Nov	889,579	5,380,128	4,051
20-Nov		97509.40	97509.40	0.00	0	20-Nov	880,560	6,260,688	0	0.00%	20-Nov	880,560	6,260,688	4,010
21-Nov		97509.40	97509.40	0.00	0	21-Nov	571,038	6,831,725	0	0.00%	21-Nov	571,038	6,831,725	2,600
22-Nov		97509.40	97509.40	0.00	0	22-Nov	0	6,831,725	0	0.00%	22-Nov	0	6,831,725	0
23-Nov		97509.40	97509.40	0.00	0	23-Nov	846,000	7,677,725	0	0.00%	23-Nov	846,000	7,677,725	3,852
24-Nov		97509.40	97509.40	0.00	0	24-Nov	0	7,677,725	0	0.00%	24-Nov	0	7,677,725	0
25-Nov		97509.40	97509.40	0.00	0	25-Nov	0	7,677,725	0	0.00%	25-Nov	0	7,677,725	0
26-Nov		97509.40	97509.40	0.00	0	26-Nov	0	7,677,725	0	0.00%	26-Nov	0	7,677,725	0
27-Nov		97509.40	97509.40	0.00	0	27-Nov	592,563	8,270,288	592563	100.00%	27-Nov	592,563	8,270,288	2,698
28-Nov		97509.40	97509.40	0.00	0	28-Nov	947,618	9,217,906	947618	100.00%	28-Nov	947,618	9,217,906	4,315
29-Nov		97509.40	97509.40	0.00	0	29-Nov	811,976	10,029,882	811976	100.00%	29-Nov	811,976	10,029,882	3,697
30-Nov		97509.40		0.00	0	30-Nov		10,029,882	0	0.00%	30-Nov	0	10,029,882	0
01-Dec		0.00		0.00	0									
2,909,291						10,029,882			0.1000		45,670			